

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

THE STATE OF TEXAS, et al.,

Defendants.

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Consolidated Case No. 5:21-CV-0844-XR

***OCA-GREATER HOUSTON AND HAUL PLAINTIFFS' SIXTH SUPPLEMENTAL RULE
26(a)(1) INITIAL DISCLOSURES***

Pursuant to Federal Rule of Civil Procedure 26, Plaintiffs in the matters of *OCA-Greater Houston, et al., v. Jane Nelson, et al.* (Case No. 1:21-cv-0780-XR) and *Houston Area Urban League, et al., v. Gregory Wayne Abbott, et al.* (Case No. 5:21-cv-0848-XR) make the following sixth supplemental initial disclosures.

I. Supplemental Initial Disclosure Qualifications

These supplemental disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs' right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be relevant to the issues in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality,

undue burden, hearsay, or any other valid objection in response to any discovery request or proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

II. Supplemental Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(i))

In addition to the persons identified in Plaintiffs' previous disclosures, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment.

1. Sam Hwong, on behalf of Plaintiff OCA-Greater Houston.

Mr. Hwong may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12th Floor, New York, NY 10013, (212) 966-5932. Mr. Hwong is a member of OCA-Greater Houston and will likely have discoverable information regarding the impact of SB 1 on senior voters, particularly those with limited English proficiency, including during the November 2022 election.

2. Elizabeth Hwong, on behalf of Plaintiff OCA-Greater Houston.

Ms. Hwong may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12th Floor, New York, NY 10013, (212) 966-5932. Ms. Hwong is a member of OCA-Greater Houston and will likely have discoverable information regarding the impact of SB 1 on senior voters, particularly those with limited English proficiency, including during the November 2022 election.

3. Lorena Maher, on behalf of Plaintiff League of Women Voters of Texas.

Ms. Maher may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Maher is a member of the League of Women Voters of Texas, has a disability, and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

4. Patricia Buck, on behalf of Plaintiff League of Women Voters of Texas.

Ms. Buck may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Buck is a member of the League of Women Voters of Texas, has a disability, and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

5. Milan Suarez, on behalf of Plaintiff League of Women Voters of Texas.

Ms. Suarez may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Suarez is a member of the League of Women Voters of Texas and will likely have discoverable information regarding the impact of SB 1 on voters who were eligible to vote by mail during the November 2022 election.

6. Bernadette Maloney, on behalf of the OCA-GH Plaintiffs.

Ms. Maloney may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Maloney will likely have discoverable information regarding the impact of SB 1 on voters who were eligible to vote by mail during the November 2022 election.

7. Ann Scott and Taylor Scott, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.

Ann and Taylor Scott may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073, or counsel for the HAUL Plaintiffs at 1825 K Street NW, Suite 1200, Washington, DC 20006. Ann and Taylor Scott are members of REVUP-Texas and The Arc of Texas. Ann Scott assists her daughter Taylor Scott, who has a disability, and both will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

8. Yvonne Iglesias, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.

Ms. Iglesias may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073, or counsel for the HAUL Plaintiffs at 1825 K Street NW, Suite 1200, Washington, DC 20006. Ms. Iglesias is a member of REVUP-Texas and The Arc of Texas, has a disability, and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

9. Albert Walker, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.

Mr. Walker may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073, or counsel for the HAUL Plaintiffs at 1825 K Street NW, Suite 1200, Washington, DC 20006. Mr. Walker has a disability and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

10. Ruth Eder and Fritz Eder, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.

Mr. and Mrs. Eder may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073, or counsel for the HAUL Plaintiffs at 1825

K Street NW, Suite 1200, Washington, DC 20006. Mrs. Eder assists Mr. Eder, who has a disability, and both will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

11. Mary Smith, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.

Ms. Smith may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073, or counsel for the HAUL Plaintiffs at 1825 K Street NW, Suite 1200, Washington, DC 20006. Ms. Smith has a disability and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who were eligible to vote by mail during the November 2022 election.

12. Roberto Benavides, on behalf of the OCA-GH Plaintiffs.

Mr. Benavides may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Mr. Benavides will likely have discoverable information regarding the impact of SB 1's mail voting identification provisions on his ability to cast a ballot during the November 2022 election.

13. Jane Briggs Gamez, on behalf of the OCA-GH Plaintiffs.

Ms. Briggs Gamez may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Briggs Gamez will likely have discoverable information regarding the impact of SB 1's mail voting identification provisions on her ability to cast a ballot during the November 2022 election.

14. Michelle Brown, on behalf of Plaintiff Delta Sigma Theta Sorority, Inc.

Ms. Brown may be contacted through counsel for the HAUL Plaintiffs at 700 14th Street NW, Suite 600, Washington, DC 20005, (202) 682-1300. Ms. Brown is the Southwest Regional Director of Delta Sigma Theta Sorority, Inc. and will likely have discoverable information regarding Delta Sigma Theta's history, mission, and political participation activities; Delta Sigma

Theta's political participation activities in Texas; the effects of SB 1 on Delta Sigma Theta's political participation resources and activities; the effects of SB 1 on members' ability to cast a ballot that will count in Texas; the effects of SB 1 on Delta Sigma Theta's voter assistance efforts; and Delta Sigma Theta's activities related to election legislation in 2021.

B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))

Plaintiffs make no supplements with respect to the documents in their possession, custody, or control.

C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered (Fed. R. Civ. P. 26(a)(1)(A)(iii))

Plaintiffs do not seek damages but do intend to seek recovery of attorneys' fees and costs incurred in this litigation.

Dated February 24, 2023.

Respectfully submitted,

/s/ Zachary Dolling

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CERTIFICATE OF SERVICE

I certify that on February 24, 2023, I served a true and correct copy of the foregoing via electronic mail on all counsel of record.

/s/ Zachary Dolling
Zachary Dolling